

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MARYLAND**

In re:

Michael A. Mayhew & Robin E. Mayhew
Debtor(s)

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* Case No. 12-10247
* Chapter 7

DLJ Mortgage Capital, Inc.
c/o Selene Finance LP

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Movant

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vs.

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Michael A. Mayhew & Robin E. Mayhew,
Debtor(s)/Respondent

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*
*

and

*

Laura J. Margulies
Trustee

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RESPONSE OF DEBTOR TO MOTION FOR RELIEF FROM AUTOMATIC STAY

Debtor(s), by Counsel, hereby respond to the Creditor, DLJ Mortgage Capital, Inc. c/o Selene Finance LP's Motion for Relief from Automatic Stay, and request that such Motion be in all things denied and states as follows:

1. Debtor(s) admit the allegations of Paragraph 1 of the Motion herein.
2. Debtor(s) admit the allegations of Paragraph 2 of the Motion herein.
3. Debtor(s) admit the allegations of Paragraph 3 of the Motion herein.
4. Debtor(s) admit the allegations of Paragraph 4 of the Motion herein.
5. Debtor(s) admit the allegations of Paragraph 5 of the Motion herein.
6. Debtor(s) admit the allegations of Paragraph 6 of the Motion herein.
7. Debtor(s) admit the allegations of Paragraph 7 of the Motion herein.
8. Debtor(s) can neither admit or deny the allegations of Paragraph 8 of the Motion herein due to insufficient information.
9. Debtor(s) deny the allegations of Paragraph 9 of the Motion herein.
10. Debtor(s) deny the allegations of Paragraph 10 of the Motion herein.
11. Debtor(s) admit the allegations of Paragraph 11 of the Motion herein.

12. Debtor(s) deny the allegations of Paragraph 12 of the Motion herein.

13. Debtor(s) deny the allegations of Paragraph 13 of the Motion herein.

14. Debtor(s) deny the allegations of Paragraph 14 of the Motion herein.

15. Debtor(s) hereby request that this Honorable Court take judicial notice that the Debtors have caught up on the arrears referenced in Paragraph 9 of the Motion herein and are in communications with the movant to work out repayment options for any remaining fees due.

WHEREFORE, Debtor(s) pray that Movant, DLJ Mortgage Capital, Inc. c/o Selene Finance LP's Motion for Relief from Automatic Stay be in all things denied.

Dated: May 15, 2015

Respectfully submitted,

/s/ Suren G. Adams

Debtor's Counsel--Suren G. Adams, #16097
Adams Law Office, LLC
16701 Melford Blvd, Suite 125
Bowie, MD 20715
(301)805-5892

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Response of Debtor to Motion for Relief from Automatic Stay has been served by CM/ECF electronic mail on May 15, 2015 to:

Counsel for Movant

Jonathan S. Foreman, Esq. MD Fed. Bar No. 18930
Attorney for Movant
BWW Law Group, LLC
6003 Executive Blvd, Suite 101
Rockville, MD 20852

Chapter 7 Trustee

/s/ Suren G. Adams

Debtor's Counsel -- Suren G. Adams, # 16097
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